



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

September 1, 2005

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, CA 92618

COMMENTS ON DRAFT PHASE II REMEDIAL INVESTIGATION REPORT, IRP SITE 1, EXPLOSIVE ORDNANCE DISPOSAL RANGE, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: DOD100136000

Dear Mr. Newton:

We have reviewed the above referenced document, dated June 2005, which we received on June 5, 2005. We have the following comments:

- **3.1 Land Use and Natural Resources**, Page 3-1, second paragraph: The paragraph identifies the nearest municipal drinking water source wells ten miles downgradient of IRP Site 1. The Navy is aware of the schedule for the completion of the Irvine Ranch Water District's desalter project. The desalter project will result in municipal supply wells closer than 10 miles downgradient. This fact should be stated and discussed in the report.
- **Phase II RI Tier II Soil Sampling and Analysis**, Page 4-43: The petroleum corrective action program cleanup levels for petroleum hydrocarbons in surface soils are 100 parts per million (ppm) for gasoline range, 1,000 ppm for diesel range, and a site specific determination for waste oil range. These cleanup levels are appropriate for IRP Site 1.
- **Table 4-22: Minimum and Maximum Concentrations of Detected Metals – Perchlorate Investigation**, Page 4-49: Please indicate whether the analytical method included and reported molybdenum concentrations, and provide us with all of the data pertaining to the reported values.
- **Verification of Perchlorate**, Page 4-109, second paragraph: The State Department of Health Services has replaced the term "action level" with "Drinking Water Notification Level." The notification level for perchlorate is 0.006 milligrams per liter. We use the notification level as the groundwater cleanup goal for perchlorate.

California Environmental Protection Agency

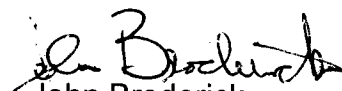


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- **4.6.8 Metals**, Page 4-125: To support your finding that Site 1 is not impacting downgradient surface waters, we recommend that you differentiate between metals detected in surface waters within the site, or associated with the pond, and detections at the downgradient sampling point. For surface water flows in the San Diego Creek watershed, we have various criteria that are applicable in addition to the National Recommended Water Quality Criteria or aquatic risk-based screening values. They include: TMDLs (Total Maximum Daily Load) for sediments, nutrients, and toxics; California Toxics Rule criteria; and Basin Plan Objectives.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc via email: Mr. Richard Muza, US EPA, Region 9
Mr. Frank Cheng, DTSC, Office of Military Facilities
Mr. Gordon Brown, NAVFACENGCOM, Southwest Division

